

In the Matter Of:
KULAKOWSKI vs WESTROCK SERVICES

WILLIAM WHITED

December 21, 2017



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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

MICHAEL KULAKOWSKI,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO.
)	3:16-CV-02510
)	
WESTROCK SERVICES, INC.,)	
)	
Defendant.)	

VIDEOTAPED DEPOSITION OF
WILLIAM LEE "TOMMY" WHITED
Taken on Behalf of the Plaintiff
December 21, 2017
Commencing at 9:14 a.m.

Reported by: Jerri L. Porter, RPR, CRR
Tennessee LCR No. 335
Expires: 6/30/2018

<p>1 APPEARANCES: 2 For the Plaintiff: 3 HEATHER MOORE COLLINS 4 ANNE HUNTER 5 PAIGE LYLE 6 Collins & Hunter 7 7000 Executive Center Drive 8 Building 2, Suite 320 9 Brentwood, Tennessee 37027 10 (615) 724-1996 11 heather@collinshunter.com 12 anne@collinshunter.com 13 paige@collinshunter.com 14 15 For the Defendant: 16 MARY DOHNER SMITH 17 Constangy, Brooks, Smith & Prophete 18 1010 SunTrust Plaza 19 401 Commerce Street 20 Nashville, Tennessee 37219 21 (615) 320-5200 22 mdohner@constangy.com 23 24 For the Witness: 25 DOUG JOHNSTON Barrett Johnston Martin & Garrison 414 Union Street Suite 900 Nashville, Tennessee 37219 (615) 244-2202 djohnston@barrettjohnston.com Also Present: Sophia Gordon, Videographer</p>	<p>Page 2</p> <p>1 The videotaped deposition of WILLIAM 2 LEE "TOMMY" WHITED was taken on behalf of the 3 Plaintiff on December 21, 2017, in the offices of 4 Barrett Johnston Martin & Garrison, 414 Union 5 Street, Suite 900, Nashville, Tennessee, for all 6 purposes under the Federal Rules of Civil Procedure. 7 The formalities as to notice, caption, 8 certificate, et cetera, are waived. All objections, 9 except as to the form of the questions, are reserved 10 to the hearing. 11 It is agreed that Jerri L. Porter, 12 being a Notary Public and Court Reporter for the 13 State of Tennessee, may swear the witness, and that 14 the reading and signing of the completed deposition 15 by the witness are reserved. 16 17 18 19 20 21 * * * 22 23 24 25</p> <p>Page 4</p>
<p>1 I N D E X 2 INDEX OF EXAMINATIONS 3 4 Page 5 Examination By Ms. Collins6 6 Examination By Ms. Dohner Smith60 7 Examination By Ms. Collins82 8 Examination By Ms. Dohner Smith85 9 Examination By Mr. Johnston86 10 11 12 13 PREVIOUSLY MARKED EXHIBITS 14 PRESENTED TO WITNESS 15 16 Exhibit Description Page 17 No. 24 8/30/16 Whited Separation Notice23 18 Bates WestRock 000246 19 20 21 22 Reporter's Note: All proper names in the 23 transcript are spelled phonetically, unless 24 spelling is provided by counsel or witness. 25</p>	<p>Page 3</p> <p>1 P R O C E E D I N G S 2 VIDEOPHOTOGRAPHER: We are now on the 3 record. The time on the monitor is 9:14 a.m. 4 Today's date is December 21st, 2017. This marks 5 the beginning of Disk 1 of the deposition of William 6 Tommy Whited. 7 Would counsel please introduce yourselves 8 and state whom you represent. 9 MS. COLLINS: Heather Collins for the 10 plaintiff. 11 MS. DOHNER SMITH: Mary Dohner -- oh, 12 sorry. We've got co-counsel. 13 MS. HUNTER: Anne Hunter for plaintiff. 14 MS. LYLE: Paige Lyle for plaintiff. 15 MS. DOHNER SMITH: Mary Dohner Smith on 16 behalf of the defendant. 17 MR. JOHNSTON: Doug Johnston on behalf 18 of the witness. 19 VIDEOPHOTOGRAPHER: Would the court reporter 20 please swear in the witness. 21 * * * 22 WILLIAM LEE "TOMMY" WHITED 23 was called as a witness, and after having been first 24 duly sworn, testified as follows: 25</p> <p>Page 5</p>

Page 6		Page 8	
1	EXAMINATION	1	A Yes, that's correct. Prior to that, it was
2	BY MS. COLLINS:	2	kind of split between the two.
3	Q Good morning. Could you state your complete	3	Q What was the percentage prior to that?
4	name for the record, please?	4	A You know, it's really difficult to say. I
5	A William Lee Whited.	5	was back and forth between the two. I probably
6	Q And Mr. Whited --	6	spent 70 percent of my time at the sheet plant.
7	A I'm sorry. They call me Tommy.	7	Q When did y'all get that piece of equipment
8	Q Okay. Mr. Whited, what is your address?	8	so that you started spending more time at the
9	A I live at 271 Greenfield Lane, in	9	fulfillment center?
10	Castalian Springs, Tennessee.	10	A The piece of equipment was delivered during
11	Q What is that zip code?	11	the holidays, and we started installation on
12	A 37031.	12	January 4th of 2016.
13	Q And what is your phone number?	13	Q Who was your immediate supervisor?
14	A My cell phone number is (615)948-1956, and I	14	A Tom Pedine.
15	do not have a landline at home.	15	Q In the hierarchy at WestRock, were you the
16	Q Okay. What is your date of birth?	16	highest ranking management official at the Gallatin
17	A April 3rd, 1953.	17	facility?
18	Q Are you currently employed?	18	A On a daily basis, yes.
19	A I am not.	19	Q How often was Tom Pedine at the Gallatin
20	Q Where was -- where were you last employed?	20	plant in 2015/2016?
21	A With WestRock.	21	A I'm going to have to guess. I don't
22	Q When did that employment end?	22	remember exactly, but Tom probably visited the plant
23	A That was August 30th of 2016.	23	three or four times.
24	Q Okay. At the time that you were terminated,	24	Q Who was the HR person assigned to the
25	what was your job title?	25	Gallatin plants in 2015/2016?
Page 7		Page 9	
1	A I was the general manager for the Gallatin	1	A Helen Kendall was the HR representative for
2	plant operations.	2	the plant.
3	Q The Gallatin plant operations, that refers	3	Q What was Ms. Kendall responsible for as the
4	to two facilities, the sheet plant and the	4	HR representative?
5	fulfillment center, correct?	5	A Helen actually was the -- my -- she doubled
6	A That's correct.	6	as the office assistant, the administrative
7	Q Okay. How long were you in that position?	7	assistant. She was responsible for keeping the
8	A I took that position in, I believe it was	8	payrolls, taking care of employee files, managing
9	1986.	9	inventory reporting to the home office, a number of
10	Q Of those two facilities, where was your	10	things along those lines.
11	office located?	11	Q Could people also make complaints if they
12	A Actually, my office was at the sheet plant.	12	were having problems with another employee to Helen?
13	Q Okay. How much time in the last two years	13	A They could go to Helen and she certainly had
14	of your employment did you spend at the fulfillment	14	the authority to report them to the business unit HR
15	center?	15	rep and the area and regional reps.
16	A The majority of my time in that -- in the	16	Q Who was the business unit HR rep?
17	last year was probably at the fulfillment center.	17	A Terri Henley is the business unit. Or she
18	Q Why was that?	18	was. I assume she still is.
19	A We had taken on some -- an account for GE,	19	Q How often did Ms. Henley come out to the
20	General Electric, piece of business there that	20	Gallatin facilities in 2015?
21	required the installation of a one of a kind piece	21	A I'm guessing again, but I remember a couple
22	of equipment that -- and I was asked by my boss to	22	of times that she visited the plant.
23	get it up and running and make the thing successful.	23	Q When Ms. Henley would come out to the
24	Q Okay. And so that was in 2016 that you	24	Gallatin plants, what was typically the purpose of
25	spent most of your time at the fulfillment center?	25	her visit?

<p style="text-align: right;">Page 10</p> <p>1 A Usually we'd talk about training or --</p> <p>2 that's really all -- the only thing I remember her</p> <p>3 coming for in 2015 was training.</p> <p>4 Q What kind of training?</p> <p>5 A We were changing some of our -- putting in</p> <p>6 kiosks and those type things, and I think she was</p> <p>7 there to work with Helen on some of that type of</p> <p>8 stuff.</p> <p>9 Q Kiosks for what?</p> <p>10 A For employees to be able to do the employee</p> <p>11 surveys and those type things.</p> <p>12 Q Were the employee surveys just done on an</p> <p>13 annual basis?</p> <p>14 A Yes.</p> <p>15 Q Were they done at a specific time each year?</p> <p>16 A They were. They came about during a certain</p> <p>17 period, and I'm not sure exactly what that period</p> <p>18 was.</p> <p>19 Q Okay. What about 2016? Was her presence at</p> <p>20 the plant about the same?</p> <p>21 A No. Actually, she -- it increased. She --</p> <p>22 she was there more often.</p> <p>23 Q Why was she there more often in 2016?</p> <p>24 A I -- I did ask that question, and she told</p> <p>25 me she was just there to -- a couple of times she</p>	<p style="text-align: right;">Page 12</p> <p>1 harassment during that time frame?</p> <p>2 A I truly don't recall any.</p> <p>3 Q As a WestRock manager, did you have to do</p> <p>4 any sort of online courses for -- that related to</p> <p>5 your sexual harassment policies?</p> <p>6 A We did some online courses, and I do not</p> <p>7 remember what all of the makeup of those things</p> <p>8 were. There were a number of them that we did.</p> <p>9 Q When you did those, did you have to sign off</p> <p>10 saying that you did that?</p> <p>11 A I did.</p> <p>12 Q Okay. Who maintained the employee files out</p> <p>13 at the Gallatin facilities?</p> <p>14 A I'm sorry?</p> <p>15 Q Who maintained the employee files out at the</p> <p>16 Gallatin --</p> <p>17 A That was Helen. Helen Kendall.</p> <p>18 Q What about your file? Was that also</p> <p>19 maintained out at Gallatin or was that maintained at</p> <p>20 a regional office, to your knowledge?</p> <p>21 A You know, to my knowledge, it was -- it was</p> <p>22 maintained outside the plant. Corporate, I think,</p> <p>23 is where the -- our files were. Now, that's to the</p> <p>24 best of my knowledge. I can't swear that that's</p> <p>25 where they were.</p>
<p style="text-align: right;">Page 11</p> <p>1 told me she was just there because she was going to</p> <p>2 Murfreesboro and she wanted to stop by and visit and</p> <p>3 she was just killing some time.</p> <p>4 Q Was that around the end of 2016, when she</p> <p>5 was conducting an investigation, or was that in</p> <p>6 general, she was just around more?</p> <p>7 A Probably started to see some of the -- her</p> <p>8 coming by in midyear.</p> <p>9 Q Okay. Who would she typically meet with</p> <p>10 when she would come out?</p> <p>11 A She would -- she would see Helen, see</p> <p>12 myself. And I can't tell you who else she met with.</p> <p>13 I just don't know.</p> <p>14 Q Okay. When she would come out, would she go</p> <p>15 to both facilities, to your knowledge?</p> <p>16 A I know she would sometimes. I can't tell</p> <p>17 you if she always did or not. I wouldn't know the</p> <p>18 answer to that.</p> <p>19 Q At the Gallatin plants -- and I'm</p> <p>20 specifically sort of narrowing it down to the</p> <p>21 2015/2016 time frame -- did y'all have any sort of</p> <p>22 specific training for employees, non-management</p> <p>23 employees, for sexual harassment?</p> <p>24 A I do not recall any.</p> <p>25 Q Did management have training for sexual</p>	<p style="text-align: right;">Page 13</p> <p>1 Q And when you say corporate, where are you</p> <p>2 referring to?</p> <p>3 A Our home office was in Norcross, Georgia.</p> <p>4 Q A moment ago you mentioned surveys. When</p> <p>5 the employees did these annual surveys, did you</p> <p>6 receive a summary of the results of those surveys?</p> <p>7 A Yes.</p> <p>8 Q What sort of information did the summary</p> <p>9 provide?</p> <p>10 A It was primarily a rating on a variety of</p> <p>11 topics that told us how we were doing.</p> <p>12 Q Did you get any specific feedback other than</p> <p>13 a rating? Like examples of comments employees had</p> <p>14 made without --</p> <p>15 A Yes. There was a comment section in the --</p> <p>16 at the -- I think it was at the end of the survey,</p> <p>17 there were comments in there.</p> <p>18 Q Would it identify who had made the comment?</p> <p>19 A Would it -- as far as having their names?</p> <p>20 Q Yes.</p> <p>21 A No, no.</p> <p>22 Q As the -- as the general manager of the</p> <p>23 Gallatin facilities, were you typically made aware</p> <p>24 of complaints, of employee complaints?</p> <p>25 A I -- I can't tell you that I was aware of</p>

<p style="text-align: right;">Page 14</p> <p>1 all complaints, because I don't know what all of 2 them may have been. It was -- if there were 3 complaints, I was certainly made aware of some 4 complaints. Whether or not it was all of them, I 5 can't answer that for you.</p> <p>6 Q Who would make you aware if a complaint had 7 been made?</p> <p>8 A Generally, that would come from my plant 9 manager, and that was Larry Eden.</p> <p>10 Q What about global hotline complaints? Were 11 you made aware of those?</p> <p>12 A Not through Larry Eden, no. Any -- those 13 type things, if I heard anything about them, it 14 would be through Terri Henley, yes, Terri Henley, 15 the HR rep for the business unit.</p> <p>16 Q How would she notify you of a global hotline 17 complaint that pertained to the Gallatin plants?</p> <p>18 A Terri talked to me about one, and if I -- 19 the best of my recollection was that it was on one 20 of her visits that we talked about it.</p> <p>21 Q Tell me about that.</p> <p>22 A The complaint was -- had to do with a 23 forklift driver that had a -- felt like he had been 24 not adhered to over some of his concerns about 25 loading a truck.</p>	<p style="text-align: right;">Page 16</p> <p>1 frame?</p> <p>2 A The one that I just mentioned is really 3 the -- it's the only one I recall.</p> <p>4 Q When you said you would look into a 5 complaint, what do you mean by that? What would you 6 do?</p> <p>7 A As with that particular complaint, I really 8 didn't have to look into it, because I'd already 9 addressed the situation from it. If there was -- 10 and that's really the only one that I had at that 11 time. I had already taken care of that.</p> <p>12 Q Okay. Did you communicate to the employees 13 at the Gallatin plants that if complaints were made, 14 you would know about them?</p> <p>15 A No, I did not tell them that.</p> <p>16 Q Did you at any point in the -- from 2014 to 17 2016, discourage employees from making complaints?</p> <p>18 A No.</p> <p>19 Q While working for WestRock or its 20 predecessor, RockTenn, were you disciplined for any 21 sort of policy infraction that involved harassment 22 or a violation of the code of conduct?</p> <p>23 A No. I've not been disciplined for any of 24 that, no.</p> <p>25 Q Have you been disciplined for anything in</p>
<p style="text-align: right;">Page 15</p> <p>1 Q Who was that?</p> <p>2 A The lift driver?</p> <p>3 Q Yes.</p> <p>4 A His name was Tommy Davis. But, now, he was 5 not the one who made the complaint.</p> <p>6 Q Who made the complaint?</p> <p>7 A I don't know who made the complaint. It was 8 an anonymous complaint. Well, I say it was 9 anonymous. As far as I know, it was anonymous. I 10 was never told who made the complaint.</p> <p>11 Q Would Ms. Henley or anyone else in HR ever 12 provide you with a copy of the global hotline 13 complaint --</p> <p>14 A No.</p> <p>15 Q -- as it came to them?</p> <p>16 A No.</p> <p>17 Q Was it typically just a verbal communication 18 that a complaint was made?</p> <p>19 A Yes.</p> <p>20 Q Did you discuss that with the employees, 21 that you got -- you were notified of complaints that 22 were made at the Gallatin plants?</p> <p>23 A I would look into the -- into the complaint, 24 yes.</p> <p>25 Q How many were made in the 2015/2016 time</p>	<p style="text-align: right;">Page 17</p> <p>1 the past ten years?</p> <p>2 A No.</p> <p>3 Q Were you made aware that in 2013 a complaint 4 of sexual harassment was made against you through 5 the global hotline?</p> <p>6 A No.</p> <p>7 Q Did anyone discuss that with you?</p> <p>8 A No.</p> <p>9 Q So no one asked you about any allegations of 10 sexual harassment in 2013?</p> <p>11 A No. Not that I remember, no.</p> <p>12 Q Well, you'd probably recall something like 13 that, wouldn't you?</p> <p>14 A I would certainly think so, but no.</p> <p>15 Q To your knowledge, had any employee or 16 subcontractor of WestRock made a complaint of sexual 17 harassment against you?</p> <p>18 A No.</p> <p>19 Q What was your understanding of the reasons 20 why you were terminated?</p> <p>21 A Well, I was never given any reasons.</p> <p>22 Q Tell me what you were told.</p> <p>23 A The day that -- the day that I was 24 terminated, I asked for a specific reason for the 25 termination, and I was told that there had been a</p>

<p style="text-align: right;">Page 18</p> <p>1 complaint, there had been an investigation, I was 2 asked some questions, and that there was no point 3 rehashing it.</p> <p>4 Q Who told you that?</p> <p>5 A That was Jeb Bell.</p> <p>6 Q Who else was there on the day you were 7 terminated?</p> <p>8 A Tom Pedine, Melinda McGraw, and Terri 9 Henley.</p> <p>10 Q Did they give you the opportunity to resign 11 in lieu of termination?</p> <p>12 A They did.</p> <p>13 Q And who said that you could resign instead 14 of being terminated?</p> <p>15 A Jeb Bell.</p> <p>16 Q What did you say to that?</p> <p>17 A My -- well, actually, I had a question 18 regarding that. And my question was simply, what 19 was going to be best for me from a financial 20 standpoint. And the -- there was a lot of confusion 21 about that.</p> <p>22 Without going into, you know, a long drawn 23 out something for you, I really didn't get -- didn't 24 get a satisfactory answer about things such as the 25 bonus that I -- that would have come at the end of</p>	<p style="text-align: right;">Page 20</p> <p>1 from there to the sheet plant, Melinda had made a 2 call by the time we got to the sheet plant, and when 3 we got there, she told me that it didn't matter if I 4 resigned or was terminated, that I wasn't entitled 5 to anything. And at that point, I told Melinda, 6 then you just terminated me, then.</p> <p>7 Q Before y'all got to the sheet plant and you 8 cleaned out your desk and she had that phone 9 conversation, had you been given a separation 10 notice?</p> <p>11 A No.</p> <p>12 Q That day were you given a separation notice?</p> <p>13 A No.</p> <p>14 Q Have you ever been provided a separation 15 notice?</p> <p>16 A I have. It was the following day.</p> <p>17 Q Who did you receive that from?</p> <p>18 A Received that from Melinda McGraw.</p> <p>19 Q In person or by mail?</p> <p>20 A In person.</p> <p>21 Q Where did you receive -- where were y'all?</p> <p>22 A We were back at the conference room at 23 fulfillment.</p> <p>24 Q So, was this on August 31st?</p> <p>25 A Thirty-first.</p>
<p style="text-align: right;">Page 19</p> <p>1 September, these type things. So, as I asked -- and 2 I don't want to bore you with a lot of detail, but 3 it was evident that I couldn't get answers. So I 4 wasn't looking to resign. Told them they could 5 terminate me. Now, that took place with Melinda 6 McGraw a little bit later.</p> <p>7 Q Not during the meeting with -- 8 (Overlapping speech.)</p> <p>9 A Not during that meeting, no.</p> <p>10 Q Okay. Was that a phone call with Melinda 11 McGraw?</p> <p>12 A No.</p> <p>13 Q Was it after others had left or how did that 14 play out?</p> <p>15 A It -- the way the thing happened was that we 16 were in the conference room at fulfillment. We had 17 that discussion. I asked about the financial impact 18 to me. And initially, Melinda was the one answering 19 the question. She thought that I would get a 20 prorated bonus and that kind of thing if I resigned. 21 And if I was terminated, I would get nothing. So 22 I'm like -- at that point, I felt it was probably in 23 my best interest if I was going to resign.</p> <p>24 Cleaned out my office there. And my office 25 was simply a desk in the back. But when we went</p>	<p style="text-align: right;">Page 21</p> <p>1 Q The day after you were -- they notified you 2 of your termination?</p> <p>3 A Yes.</p> <p>4 Q Did she ask you to come out there to meet 5 her to get the separation notice?</p> <p>6 A I believe that was -- I can't recall if she 7 asked me to come out for that or not, to be 8 perfectly honest with you.</p> <p>9 Q Why would you have been out there the day 10 after you were terminated?</p> <p>11 A There was some confusion regarding my cell 12 phone. The day -- on the 30th when I was 13 terminated, Melinda had taken my cell phone. She 14 had -- she deactivated the number and then erased 15 everything in the -- in the phone. She should not 16 have done that, as I found out from corporate, 17 because I was asking if I could keep my phone number 18 because it was mine very early on.</p> <p>19 And actually, by the time we went through 20 the whole situation and I had conversations with 21 folks at our corporate office, the way it should 22 have been handled was that my phone should have only 23 had the password to the e-mail changed, because I 24 owned the phone. I had bought it myself.</p> <p>25 So when I called Melinda to talk about that</p>

<p style="text-align: right;">Page 22</p> <p>1 and to try to get my phone number reactivated, at 2 that point I went back to the -- or I told her I 3 wanted to get my phone back and I told her what 4 corporate had said. And when I told her that, she 5 asked Mr. Bell if I could -- well, I told her that 6 if she wanted to bring me the phone, you know, I'd 7 wait at the Verizon store for her to bring it. 8 Now, Mr. Bell was there. She asked Mr. Bell 9 if I could come back and get the phone, and he 10 approved it. Or she said that he did. I didn't 11 talk to him directly. So I went back to get the 12 phone, and when I went back and got my phone is when 13 I completed the separation slip. 14 Q Okay. Who at corporate did you talk to? 15 A I wish I could tell you her last name. Her 16 first name was Joann. 17 Q And that was someone in Atlanta or -- 18 A Norcross. 19 Q Norcross. Did you see or talk to Jeb Bell 20 the next day, on the 31st, when you -- 21 A No. 22 Q Okay. So when you got your phone back, had 23 everything been wiped off of it? 24 A Oh, yeah. 25 Q Including text messages?</p>	<p style="text-align: right;">Page 24</p> <p>1 BY MS. COLLINS: 2 Q All right. Have you seen this document 3 before? 4 A Excuse me. I have. 5 Q Was this the separation notice that 6 Ms. McGraw gave you? 7 A It is. 8 Q And it looks like there's a mark-out 9 section, where it was marked out under the explain 10 the circumstances of this separation. 11 A You're going to have to tell me where we 12 are. 13 Q In that box. That box where there's also 14 handwriting. 15 A Oh, here (indicating)? 16 Q Yes. 17 A Okay. 18 Q Was this the -- that part that was marked 19 out, did that initially say resignation? 20 A I don't know. 21 Q Okay. Did she make any changes to this 22 document in front of you? 23 A I didn't see her make changes to it, but 24 she -- we were positioned like here and there 25 (indicating). I don't know if she did or not. She</p>
<p style="text-align: right;">Page 23</p> <p>1 A Text messages, the pictures from my 2 granddaughter's graduations. It was clean. All 3 my -- all the contact information, everything was 4 gone from it. 5 Q Did you use your cell phone to text with 6 employees of WestRock while you were there? 7 A I was not big on texting, no. 8 Q Prior to you being terminated, had you 9 engaged in any e-mail communication about the 10 investigation that led up to your termination or 11 your termination? 12 A No, not that I remember. 13 Q Did you e-mail much? 14 A I used my phone for a lot of e-mails, yeah. 15 Q And that was -- but those e-mails were 16 through a WestRock account, I assume? 17 A Yes. 18 Q Okay. I'm going to show you an exhibit real 19 quick. If you could turn to a document in there 20 that's been tabbed as Exhibit Number 24. 21 (Presented Exhibit No. 24.) 22 MS. COLLINS: I'm sorry, Doug, I didn't 23 bring extra copies. 24 THE WITNESS: Okay. 25</p>	<p style="text-align: right;">Page 25</p> <p>1 did not that I saw. 2 Q Okay. And up at the top, for the reason for 3 separation, it has the box for discharge and quit 4 marked, but then it has the box for discharged 5 circled. Do you know why that was? Or was it for 6 the reasons that you just explained? 7 A I would have to tell you -- if I'm going to 8 make an assumption, I'm assuming it's because she 9 changed it after the reasons that I just talked 10 about. 11 Q Okay. But to be clear, you did not receive 12 a copy of this document on the 30th? 13 A No, I did not. Matter of -- I'm going to go 14 a step farther. It just made me think, because what 15 she had told me on the 31st was that she was going 16 to mail it to me, but that since I came back to get 17 the phone, she'd go ahead and give it to me while I 18 was there. 19 Q And did you have any discussions with her 20 about the inconsistencies in having discharged 21 marked and quit marked? 22 A No. 23 Q After the 31st, have you been back out to 24 the plant? 25 A I have not.</p>

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1 Q The Gallatin plants, they have both men and
2 women working out there, correct?
3 A Yes.
4 Q Okay. Are you familiar with Michael
5 Kulakowski?
6 A I am.
7 Q And you worked with him?
8 A Yes.
9 Q At any point in time when you worked with
10 him, did you backhand him in his groin area?
11 A No.
12 Q Did you hit him in his groin area in any
13 way?
14 A You know, define groin area for me. If
15 you're -- if you're asking me did I ever hit him in
16 his private parts, the answer is no.
17 Q Well, if -- is there a different part of the
18 groin area where you did hit him?
19 A No, I never hit him in the groin, no.
20 Q Did you make any physical contact with
21 Michael Kulakowski anywhere in his groin area?
22 A No.
23 Q His mid section?
24 A No.
25 Q Did you ever knock -- slap his hat off his

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1 head?
2 A No.
3 Q Did you ever kick him in the workplace?
4 A No.
5 Q Did you ever hit him with a broom?
6 A No.
7 Q Did you do that to any other employees,
8 either -- did you ever hit any other employees in
9 the groin area?
10 A No. Well, what -- what we did -- and I'll
11 give you a bit of an explanation. But if there
12 was -- we would make moves that solicited a response
13 that was similar to goosing somebody in the ribs
14 maybe. But you never -- you never actually made
15 contact.
16 Q What do you mean, that solicited -- you
17 would make a move that solicited a response?
18 A Oh, my goodness. You know, maybe you'd
19 (indicating), you'd do that (indicating), like
20 you're -- you know, like you're saying -- I don't
21 know how to explain that.
22 Q So you would take your hand and act like you
23 were backhanding someone?
24 A Yes.
25 Q But you wouldn't actually make contact --

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1 A Right.
2 Q -- is what you're saying?
3 A Exactly.
4 Q And you're saying you didn't do that -- or
5 you didn't make contact with Mike White in his groin
6 area?
7 A No.
8 Q What about Terry Stafford?
9 A No.
10 Q What about Donnie Taylor?
11 A No.
12 Q What about Jerry Harville?
13 A I did with Jerry Harville one time
14 accidentally.
15 Q Tell me about that.
16 A I was -- same type thing. Jerry took a step
17 forward just as I was doing it, and I accidentally did
18 hit Jerry and I apologized for it. I told him I
19 didn't mean to -- you know, to hit him, and that it
20 happened just as he made a forward step.
21 Q When was that?
22 A Oh, gosh. That's been a long time ago.
23 Q What about Mike Hall? Did you do that to
24 Mike Hall?
25 A Who?

Page 29

1 Q Mike Hall. Is that name correct? Keith
2 Hall. Sorry.
3 A No.
4 Q What about Larry Eden?
5 A No. No. I'm sorry. I'm sorry, I have a
6 little hearing loss that's why I keep leaning over.
7 Q No, you didn't do that to Larry Eden?
8 A No. As far as actually making contact, no.
9 And that's what I think you were asking.
10 Q Do you recall an incident where you
11 backhanded Keith Hall in the groin and he got angry
12 and pushed you into a copier?
13 A No, I don't.
14 Q Do you recall him telling you to never do
15 that again?
16 A No, I do not.
17 Q Now, if other employees say that they saw
18 you hit employees out at the Gallatin plants in the
19 groin, do you have any basis to refute that?
20 MS. DOHNER SMITH: Objection.
21 THE WITNESS: I did not hit these folks
22 in the groin.
23 BY MS. COLLINS:
24 Q You didn't backhand them or flick your hand
25 at them and hit them with your fingertips?

<p style="text-align: right;">Page 30</p> <p>1 A At -- no. At them, yes, like I described, 2 yes, we'd do that. But no, I -- I did not hit them. 3 The incident that I told you about with Jerry 4 Harville was an accident that happened, as I said, 5 as he stepped forward. I don't remember ever making 6 any contact with anybody else. 7 Q Did you ever knock Michael Kulakowski's hat 8 off his head or slap his hat off his head? 9 A Nope, not that I remember, no. 10 Q Have you ever kneed Michael Kulakowski in 11 the groin? 12 A I have gone through the motion, just as with 13 the backhand flick (indicating), gone through the 14 motions, but never hit him. 15 Q You've gone through the motions of kneeling 16 him in the groin? 17 A Yes. 18 Q Why? 19 A We were -- in the working environment that 20 we had, a lot of us had worked together for a number 21 of years, and we were friends. And it was just a 22 matter of simple camaraderie that we cut up with -- 23 you know, with each other within our group of 24 friends. Michael Kulakowski was a part of that 25 group of friends.</p>	<p style="text-align: right;">Page 32</p> <p>1 A No. 2 Q What about do that backhand, where you -- 3 A Yes. 4 Q You would do that with Mike Eden as well? 5 A Would not hit him, no. 6 Q You would not -- you maintain that you 7 didn't make contact when you did that? 8 A I didn't -- I did not make contact, no. 9 Q So that thing that you describe as a 10 backhanded motion where you did not make contact, 11 you did that to Mike Eden, right? 12 A Yes. 13 Q You did that to Michael Kulakowski? 14 A Yes. 15 Q You did that to Mike White? 16 A I don't remember ever -- Michael White. I 17 don't remember ever doing it with Michael, no. 18 Q You did that to Jerry Harville? 19 A Yes. 20 Q Did you do that to Keith Hall? 21 A No. 22 Q What about Larry Eden? 23 A Yes. 24 Q What about Donnie Taylor? 25 A No, I don't remember ever doing it with</p>
<p style="text-align: right;">Page 31</p> <p>1 Q Do you remember Michael Kulakowski telling 2 you to stop that? 3 A No. 4 Q Would you consider that horseplay in the 5 workplace? 6 A No. 7 Q What would you consider it? 8 A My definition of horseplay is creating a 9 situation or actions that cause somebody to be hurt 10 or the potential for an unsafe condition. 11 Q And you're saying you did not engage in that 12 in the workplace? 13 A No, I did not. 14 Q Did you do that with women that worked out 15 there, pretend like you were going to knee them or 16 slap them in the groin? 17 A Oh, no. No. 18 Q Would you say there's a culture of horseplay 19 out at the Gallatin plants when you were general 20 manager? 21 MS. DOHNER SMITH: Objection. 22 THE WITNESS: No. 23 BY MS. COLLINS: 24 Q Did you ever kick Mike Eden in the 25 workplace?</p>	<p style="text-align: right;">Page 33</p> <p>1 Donnie, no. 2 Q What about Terry Stafford? 3 A Yes. 4 Q What about J.R. Sanders? 5 A Yes. 6 Q Did you ever hit Donnie Taylor in the arm or 7 leg? 8 A Not that I recall. 9 Q Do you recall Donnie Taylor hitting you back 10 when you hit him in the groin? 11 A I never hit Donnie in the groin, and I don't 12 recall Donnie ever hitting me. 13 Q Did you ever smack Michael Kulakowski in the 14 back of his head? 15 A You'd have to define smack, I guess, for me. 16 Q Well, did you -- 17 A To me -- I'm sorry. 18 Q Did you come into physical contact with the 19 back of his head, either a smack, a hit, knocking 20 his hat off, anything like that? 21 A Never knocked his hat off, never hit him, 22 what I call a hit. Flick on the back of the cap, 23 yes. And no, I don't recall ever knocking his cap 24 off. 25 Q Do you recall ever hitting Michael</p>

<p style="text-align: right;">Page 34</p> <p>1 Kulakowski so hard that he fell to the ground and 2 couldn't breathe? 3 A Oh, my goodness, no. 4 Q And Michael Kulakowski did not hit you back, 5 right? 6 A Yes, he did. This was -- what I'm 7 describing is what we did with each other. 8 Q Okay. Did he hit you back physically, make 9 contact with you? Michael Kulakowski, did he ever 10 hit you back, make physical contact with you? 11 A Not in the groin area, if that's what you're 12 asking. 13 Q Anywhere on your body? 14 A Oh, slap me on the shoulder or, you know, 15 that type thing, yes. 16 Q Did you write him up for that? 17 A No. 18 Q Did you document it in any way? 19 A No. 20 Q Did you ever cuss out Michael Kulakowski in 21 the workplace? 22 A No. 23 Q Did you ever call him a stupid Polak? 24 A I don't remember ever calling him that, no. 25 I remember him calling himself that, but I don't</p>	<p style="text-align: right;">Page 36</p> <p>1 job, tell him you were going to fire him? 2 A No. 3 Q Who gave Michael Kulakowski job evaluations? 4 A That -- Larry Eden gave him his -- yeah, it 5 was Larry's job to do the job reviews on an annual 6 basis for the hourly employees. 7 Q Did you have to sign off on those? 8 A I did. 9 Q Did you see Michael Kulakowski's 10 evaluations? 11 A I don't recall seeing it, but I'm pretty -- 12 I would assume it was in there. 13 Q Did you sign off on those in addition to 14 Mr. Eden? 15 A I did Larry's reviews, yes. 16 Q But did you sign off on the other employees' 17 evaluations? 18 A You're talking about the hourly employees? 19 Q Yes. 20 A Yes. 21 Q And those evaluations, were they maintained 22 in their files? 23 A Yes. 24 Q Out at the -- 25 A They were -- should be at the sheet plant.</p>
<p style="text-align: right;">Page 35</p> <p>1 remember ever calling him that. 2 Q What about a stupid motherfucker? 3 A Ooh. I don't remember doing that, no. 4 Q Is that a term that you use? 5 A Very selectively, and in -- only with close 6 friends. 7 Q Did you use it in the workplace? 8 A No, no. 9 Q Did you ever call Michael Kulakowski a 10 pussy? 11 A I do not remember ever doing that, no. 12 Q Did you ever tell Michael Kulakowski that he 13 could suck your dick? 14 A Oh, Lord, no. 15 Q Did you ever shake your groin area or your 16 zipper at him and tell him he could suck your dick 17 or anything like that? 18 A No. 19 Q Do you recall ever doing that physical 20 motion towards any employee at WestRock? 21 A No. 22 Q And you never -- did you ever kick Michael 23 Kulakowski in his nuts or his balls? 24 A No. 25 Q Did you ever threaten Michael Kulakowski's</p>	<p style="text-align: right;">Page 37</p> <p>1 Q Did Helen maintain those? 2 A She did. 3 Q Did Mr. Pedine do your evaluations? 4 A He did one. 5 Q Who did your evaluation in 2015? 6 A That would have been Pedine. 7 Q Did you get one in 2016? 8 A No. I was -- I left before that. 9 Q Did you get a good evaluation in 2015? 10 A I did. 11 Q Have you ever hired employees out there with 12 a criminal record? 13 A Yes. 14 Q When employees are hired out at WestRock, 15 would the company typically conduct background 16 checks on them? 17 A Yes. 18 Q Did you Michael -- know Michael Kulakowski 19 had a criminal record? 20 A I did. 21 Q And that wasn't a problem with his 22 employment, correct? 23 A No. 24 Q And he wasn't the only one that worked out 25 there that had a criminal record, correct?</p>

<p style="text-align: right;">Page 38</p> <p>1 A He's the only one that comes to mind. I 2 can't tell you for sure. I don't know. 3 Q Okay. You don't have a criminal record, do 4 you? 5 A No. 6 Q Ever been arrested? 7 A No. 8 Q Do you find -- you worked with Keith Hall, 9 right? 10 A Yes. 11 Q Do you find him to be a credible person? 12 A No. 13 Q Why not? 14 A Keith -- Keith has a habit of unfortunately 15 kind of putting himself first. 16 Q So you think that makes him untruthful at 17 times? 18 A Well, taking credit, yeah, for things that 19 he was not a part of, yeah. 20 Q What about Larry Eden? Did you find him to 21 be a credible person? 22 A I found Larry to be, yes. 23 Q What about Tracy Duncan? Do you find her to 24 be a credible person? 25 A I've never had a reason to think that she's</p>	<p style="text-align: right;">Page 40</p> <p>1 A I am. 2 Q What? 3 A One example that comes to mind that I would 4 give you would be the -- we had a situation -- and I 5 think you -- we touched on it a little earlier with 6 Terri Henley, where there's some question about a 7 complaint. 8 Actually, where we got to with that was that 9 Jerry had -- the complaint was from a forklift 10 driver. The forklift driver was being told to do 11 something that was -- he was not supposed to do, 12 which was to load a damaged trailer, and the damage 13 was identified during the trailer inspection. He 14 brought it to Jerry's attention. Jerry had him go 15 ahead and load that trailer and told him to load 16 around the hole and ship it. 17 When they did that, the -- actually, the 18 forklift driver spoke with me about it. And when he 19 told me what had happened, the truck was already 20 gone. Went to the customer. It ended up being 21 returned and credits being issued. 22 And that was enough that I told Larry Eden, 23 who was Jerry's supervisor, that we couldn't have 24 that kind of thing going on out of Jerry, and that 25 we were going to have to pull Jerry out of his role</p>
<p style="text-align: right;">Page 39</p> <p>1 not. 2 Q What about Mike White, or Michael White? 3 Did you find him to be credible? 4 A You know, I can't answer that about Michael. 5 I just -- I don't know that I've ever known him to 6 be in a situation to try to determine one way or the 7 other. 8 Q Okay. But you haven't caught him telling 9 you an untruth that you -- or telling you something 10 that you later found out to be untrue, did you? 11 A No. No, not in Michael's case, no. 12 Q What about Jerry Harville? Do you find him 13 to be a credible person? 14 A No. 15 Q Why not? 16 A Jerry is -- you know, even though I like 17 Jerry, he tends to not tell things truthfully. He's 18 inaccurate with -- knowingly inaccurate with some of 19 the things he's done and said. 20 Q Did you ever write him up for anything like 21 that? 22 A The -- I -- I talked with Larry Eden about 23 it. I didn't do a write-up on him myself, no. 24 Q Specifically, what are you -- are you 25 referring to a specific situation?</p>	<p style="text-align: right;">Page 41</p> <p>1 as shipping manager for the sheet plant and find 2 something else to do with him, which we did. I 3 think Larry put him -- I think Larry put him back on 4 the die cutter, but you'd have to verify that with 5 Larry. But I think that's what he did with him. 6 Q Who was the forklift driver again? 7 A That was Tommy Davis. 8 Q What about Donnie Taylor? Do you find him 9 to be credible? 10 A I've never caught Donnie telling me a 11 falsehood that I know of. No, I can't think -- 12 Donnie tends to -- Donnie finds a lot to talk about, 13 but I've never known him to just fib to me. 14 Q What do you recall about the investigation 15 that led to your termination? 16 A I'm not sure what you're asking me. 17 Q Well, what do you know about anything that 18 led up to your termination? 19 A The only thing that really I know about it 20 was just the questions that I was asked on the 20 -- 21 I believe it was the 26th of August. 22 Q And who asked you those questions? 23 A This was in that -- with Melinda McGraw. 24 Melinda was the one that basically headed up the 25 question and answer session.</p>

<p style="text-align: right;">Page 42</p> <p>1 Q Was Terri Henley there?</p> <p>2 A She was.</p> <p>3 Q Was either -- were either of them taking</p> <p>4 notes?</p> <p>5 A I know Melinda was. I can't tell you about</p> <p>6 Terri.</p> <p>7 Q Was Melinda typing notes or handwriting</p> <p>8 notes?</p> <p>9 A I just don't -- I don't remember.</p> <p>10 Q Where was the interview?</p> <p>11 A It was at the fulfillment center conference</p> <p>12 room.</p> <p>13 Q What about Tom Pedine? Was --</p> <p>14 A Tom was there, yes.</p> <p>15 Q Anyone else besides Melinda, Terri, and Tom?</p> <p>16 A No.</p> <p>17 Q How long did the meeting last?</p> <p>18 A Hour and a half. I really don't remember</p> <p>19 just how long it was. I wasn't paying -- I know</p> <p>20 that we had a conference call that was with GE at</p> <p>21 3:00, Tom and I did. So it was over well before</p> <p>22 that. Probably in the 2:30 neighborhood it was</p> <p>23 over, and they got there may be a little bit before</p> <p>24 lunch.</p> <p>25 Q Did y'all --</p>	<p style="text-align: right;">Page 44</p> <p>1 notified me that they wanted to get together, but I</p> <p>2 don't remember the exact time frame.</p> <p>3 Q How were you notified?</p> <p>4 A I think it may have been an e-mail from</p> <p>5 Melinda. And I hate to say I think, but that's kind</p> <p>6 of -- that's what I remember. That's the way -- and</p> <p>7 it wasn't -- gosh, I just don't remember those</p> <p>8 details. I'm sorry.</p> <p>9 Q Okay. Prior to receiving an e-mail from</p> <p>10 Melinda, did you know that she and Terry had been</p> <p>11 coming out and meeting with employees?</p> <p>12 A No.</p> <p>13 Q Do you recall having a phone conversation</p> <p>14 with Keith Hall about the investigation?</p> <p>15 A No.</p> <p>16 Q Do you recall calling Keith Hall and telling</p> <p>17 him that you had a list of who all had talked with</p> <p>18 management or HR?</p> <p>19 A No.</p> <p>20 Q Do you recall calling Keith Hall and asking</p> <p>21 him what was going on?</p> <p>22 A No.</p> <p>23 Q Or how long HR had been coming out to the</p> <p>24 plant?</p> <p>25 A No.</p>
<p style="text-align: right;">Page 43</p> <p>1 A But I'm just going on memory. Don't</p> <p>2 document those times.</p> <p>3 Q Did the interview last through lunch or did</p> <p>4 y'all start the interview after lunch?</p> <p>5 A You know, it seems to me that -- and here</p> <p>6 I'm trying to rely on my memory, but it seems to me</p> <p>7 that we sent out for sandwiches. I think we started</p> <p>8 right at lunchtime and sent for sandwiches, and we</p> <p>9 got started.</p> <p>10 Q Did you take any notes during the meeting?</p> <p>11 A No.</p> <p>12 Q Did you fill out any documents?</p> <p>13 A No.</p> <p>14 Q Was the meeting recorded?</p> <p>15 A No. Well, let me say, as far as I know it</p> <p>16 wasn't recorded, unless somebody had a device on</p> <p>17 that I wasn't aware of.</p> <p>18 Q Okay. At the time that you met with Melinda</p> <p>19 McGraw, Terri Henley, and Tom Pedine, did you know</p> <p>20 that you were under investigation?</p> <p>21 A I did not know it when the meeting was</p> <p>22 arranged.</p> <p>23 Q When was the meeting arranged?</p> <p>24 A I really don't remember when that was. It</p> <p>25 was within a couple of days, I think, that they</p>	<p style="text-align: right;">Page 45</p> <p>1 Q Do you recall if you had ever told employees</p> <p>2 that hotline complaints come to you?</p> <p>3 A No.</p> <p>4 Q Do you know who mailed the initial complaint</p> <p>5 against you in August of 2016?</p> <p>6 A No.</p> <p>7 Q And you were never made aware of a complaint</p> <p>8 against you in 2013?</p> <p>9 A No.</p> <p>10 Q And I understand you have a car lot, or</p> <p>11 you're part owner in a car lot, or you were?</p> <p>12 A Used to have one, yeah.</p> <p>13 Q Okay. When did you get rid of that?</p> <p>14 A My -- my partner and I separated -- it was</p> <p>15 gone -- it's been over a year. No, it's been</p> <p>16 two years now, I guess.</p> <p>17 Q I understand you sold a car to Terry</p> <p>18 Stafford.</p> <p>19 A I did.</p> <p>20 Q And he's still making payments on that?</p> <p>21 A He is.</p> <p>22 Q Had you sold any cars to any other WestRock</p> <p>23 employees?</p> <p>24 A No.</p> <p>25 Q Have you seen Michael Kulakowski since your</p>

<p style="text-align: right;">Page 46</p> <p>1 termination?</p> <p>2 A I did see him -- I was pulling into a gas</p> <p>3 station, and I saw him there.</p> <p>4 Q Did you talk with him?</p> <p>5 A No. It was across the parking lot.</p> <p>6 Q How big was the parking lot?</p> <p>7 A I think that -- I think there are about six</p> <p>8 sets of gas pumps across the -- strung out across</p> <p>9 the parking lot. He was on the far side, and I</p> <p>10 pulled in the lower side. As far as I know, he</p> <p>11 never even saw me.</p> <p>12 Q Do you carry a handgun?</p> <p>13 A I do not.</p> <p>14 Q What about a shotgun or a rifle?</p> <p>15 A I do not.</p> <p>16 Q Do you own any firearms, handgun, shotgun?</p> <p>17 A I own firearms, yes, but they're locked in a</p> <p>18 cabinet at home.</p> <p>19 Q You don't keep them with you in the car?</p> <p>20 A No.</p> <p>21 Q Since your termination, have you talked with</p> <p>22 any WestRock employees?</p> <p>23 A Oh, yes.</p> <p>24 Q Who?</p> <p>25 A Ooh, that's going to be a string of folks.</p>	<p style="text-align: right;">Page 48</p> <p>1 talk with him about?</p> <p>2 A Pretty much same type stuff. You know,</p> <p>3 these folks -- I had an open door policy when I was</p> <p>4 at the plant. These folks come talk to me about</p> <p>5 personal issues, about work issues. You know, it's</p> <p>6 just not -- nothing out of the ordinary.</p> <p>7 Q Susan Hart, what did you talk with her</p> <p>8 about?</p> <p>9 A Same type stuff.</p> <p>10 Q How many times have you talked with her</p> <p>11 since you left?</p> <p>12 A Oh, I've talked to Susan a number of times.</p> <p>13 Q What about Terry? A number of --</p> <p>14 (Overlapping speech.)</p> <p>15 A A number of times.</p> <p>16 Q Would you say it's on a regular basis?</p> <p>17 A It's sporadic. I might talk to him two or</p> <p>18 three times in one week, may not talk to him again</p> <p>19 for two or three weeks.</p> <p>20 Q Did he tell you he was being deposed in this</p> <p>21 case?</p> <p>22 A I knew that he was being deposed. I don't</p> <p>23 know that he was the one that told me.</p> <p>24 Q Did y'all talk about his deposition?</p> <p>25 A No.</p>
<p style="text-align: right;">Page 47</p> <p>1 I've had folks call me from other plants. Let's</p> <p>2 see. Jim Hull, Deanie Brantley. I talked with</p> <p>3 Roger Smith, Ed Ammaday. I'll forget some before</p> <p>4 I'm done with this. Terry Stafford, Jason Brazzell,</p> <p>5 Austin Matthews, Susan Hart, Georgie Anthony.</p> <p>6 That's nowhere near everybody. Eric Sullivan, Terry</p> <p>7 Taylor, Jeff Scruggs. And I know that's not</p> <p>8 everybody, but that's a sampling.</p> <p>9 Q Which of those people besides Terry Stafford</p> <p>10 were at the Gallatin facility?</p> <p>11 A Let's see. Jim Hull was not. I think the</p> <p>12 first three that I gave you, Jim, Deanie, and Roger</p> <p>13 Smith are not.</p> <p>14 Q Okay. What about Ed?</p> <p>15 A Ed works out of the Gallatin facility.</p> <p>16 Q What's his job?</p> <p>17 A Ed is -- I'm not sure what he is now. He</p> <p>18 was the business unit GM. He was based in</p> <p>19 Murfreesboro. They moved him to Gallatin. Tom did,</p> <p>20 Pedine.</p> <p>21 Q What did you talk with Ed about?</p> <p>22 A Nothing in particular, just, you know, kids,</p> <p>23 how you doing, how you getting along, those types</p> <p>24 things.</p> <p>25 Q What about Terry Stafford? What did you</p>	<p style="text-align: right;">Page 49</p> <p>1 Q Have you talked about his deposition at any</p> <p>2 point in time?</p> <p>3 A About con -- no. I haven't talked to</p> <p>4 anybody about the contents of their depositions.</p> <p>5 Q What about Jason? Is he -- was he at the</p> <p>6 Gallatin plant?</p> <p>7 A Yes.</p> <p>8 Q What was his job?</p> <p>9 A Jason worked on a machine in the plant.</p> <p>10 Q How many times have you talked with Jason?</p> <p>11 A Not many. Two or three times.</p> <p>12 Q What about Austin?</p> <p>13 A Austin actually married my granddaughter a</p> <p>14 few weeks ago.</p> <p>15 Q Is he at the Gallatin plant?</p> <p>16 A He is.</p> <p>17 Q What about Georgie?</p> <p>18 A She's at the Gallatin plant. I talked to</p> <p>19 Georgie only a couple of times.</p> <p>20 Q What did y'all talk about?</p> <p>21 A Kids, you know, her youngest one deer</p> <p>22 hunting. Just personal friendship type stuff.</p> <p>23 Q Were most of these conversations on the</p> <p>24 phone or were they in person?</p> <p>25 A Been some of both. Some of these folks come</p>

<p style="text-align: right;">Page 50</p> <p>1 to my house to visit and we talk in person, 2 sometimes they call. 3 Q What about Eric? Is he from the Gallatin 4 plant? 5 A He is. 6 Q How many times have you talked with him 7 since you left? 8 A Several. 9 Q Same sort of stuff, just personal? 10 A Yeah. 11 Q What about Terry Taylor? 12 A I talked to a couple of times. 13 Q Is he at the Gallatin plant? 14 A He is. 15 Q What about Jeff? 16 A Jeff Scruggs? 17 Q Uh-huh. 18 A Only talked to Jeff a couple of times. 19 Q And he was at the Gallatin plant? 20 A Yes. 21 Q Same sort of stuff, just personal? 22 A Jeff had actually had a car wreck. 23 Q Okay. 24 A And yeah, I went to see how he was. 25 Q All right. Anyone else you can think of?</p>	<p style="text-align: right;">Page 52</p> <p>1 A They did. 2 Q -- to work out there? 3 A They did. 4 Q Which temp agency? 5 A White Staffing. 6 Q Did you have a -- out at the Gallatin 7 plants, was there a White Staffing person that 8 worked there on a regular basis? 9 A On-site supervisor, yes. 10 Q Who was that? 11 A Heather -- I'm sorry. I don't recall 12 Heather's last name off the top of my head. 13 Q Was she still there when you -- 14 A When I left, yes. I know they changed that 15 person a couple of times, but as far as I know 16 Heather -- well, Heather was still there when I 17 left, yes. 18 Q Were you aware of employees working off the 19 clock? 20 A I'm sorry? Say it again. 21 Q Were you aware of employees working off the 22 clock? 23 A At the plant? 24 Q Yes. 25 A No.</p>
<p style="text-align: right;">Page 51</p> <p>1 A Not that -- not off the top of my head, no. 2 But I would tell you that I would not say that 3 that's everybody. 4 Q Okay. Did you have any relatives that 5 worked out at the plant other than your -- I guess 6 your granddaughter's fiancé? 7 A Well, he wasn't a relative when he started. 8 Q Okay. 9 A My -- I had a nephew years ago. When my son 10 was in high school, he worked one summer when he was 11 out of school. That's really all I remember. 12 Q Did you have a personal relationship with 13 Susan Hart when you were general manager at 14 WestRock? 15 A What do you mean? 16 Q An intimate relationship. 17 A No. 18 Q Did you ever kiss her out at the plant? 19 A No. 20 Q Did you ever hire workers from your son's 21 construction company to perform work out at the 22 plant? 23 A I hired some guys that worked for my son, 24 yes. 25 Q Did they go through the temp agency --</p>	<p style="text-align: right;">Page 53</p> <p>1 Q Did you ever ask employees to come in and 2 get some work done off the clock? 3 A Did I ask them what? 4 Q Ask them to come in and get work done off 5 the clock? 6 A No. 7 Q Did you discourage employees from taking 8 vacation days? 9 A I'm sorry. I'm -- 10 Q Yeah. Did you discourage employees from 11 taking vacation days? 12 A No. Absolutely not. 13 Q Do you recall telling any employee out there 14 that you could leave now if you don't like how I run 15 things, you have to do things my way? 16 A No, I've never told anybody that. 17 Q Did you ever call Michael Kulakowski a 18 stupid son of a bitch? 19 A No. 20 Q If multiple employees stated that you 21 physically slapped them in the groin area, do you 22 have a basis to dispute that? 23 MS. DOHNER SMITH: Objection. 24 THE WITNESS: Yeah. It's like I said 25 earlier, there were a group of us who had worked</p>

<p style="text-align: right;">Page 54</p> <p>1 together for years, and we were -- we were all 2 friends. We had -- in the course of our working 3 relationship, we made gestures toward each other 4 like we were going to hit each other. 5 It was -- this was just our -- I don't 6 know what you call it. It was just our camaraderie. 7 There was -- I don't know what to tell you other 8 than there was -- if anybody hit anybody, it would 9 have been totally by accident, because I don't 10 believe there was any intentional harm meant toward 11 anybody. 12 BY MS. COLLINS: 13 Q Do you think that behavior was in 14 conformance with WestRock's policies? 15 A I think it was. 16 Q Do you recall ever telling an employee that 17 the horseplay stops now because another employee was 18 terminated for horseplay at another plant? 19 A I do, uh-huh. 20 Q Tell me about that. 21 A I know there was a -- I read about a 22 situation with our Murfreesboro facility where an 23 employee was terminated after -- well, I shouldn't 24 say after. But he was terminated, and I think there 25 was a law -- well, I know there was a lawsuit that</p>	<p style="text-align: right;">Page 56</p> <p>1 or not. Those are the ones that I remember. 2 Q What about Donnie Taylor? Was he in your 3 group? 4 A I don't remember talking to -- directly to 5 Donnie about it. 6 Q Was there anyone else in your group other 7 than those people that you just named? 8 A I don't think so. 9 Q When you talk about -- 10 A Well, I say I don't think so. Let me -- 11 there were -- you know, I'd have to sit here and 12 research this thing. Mikey Eden was -- you know, 13 Mikey wasn't adverse to coming up and slapping me on 14 the shoulder, you know. J.H. Herndon, and I didn't 15 think about Jay, because Jay had retired. I'm sure 16 there are others. 17 Q Okay. And when you talk about folks in your 18 group, those are people that y'all would engage in 19 that sort of -- 20 A Camaraderie, yes. 21 Q Well, what you called camaraderie was -- 22 where you talked had about earlier, where you said 23 that you pretended to slap someone in their groin. 24 A Uh-huh. 25 Q But you could only remember actually making</p>
<p style="text-align: right;">Page 55</p> <p>1 was connected to it in some way. And it had to do 2 with some kind of physical harassment of some -- 3 some sort. 4 And the -- in telling the folks at the 5 plant -- both plants, actually, that we had to stop 6 our -- the things that we've been talking about 7 here, because somebody that didn't know our group 8 might misinterpret what was going on, and that we 9 didn't want anybody to think there was anything that 10 was improper going on. 11 Q When was that? 12 A Gosh, that was sometime before the 13 termination. 14 Q Was it -- 15 A And when I say sometime, I mean, months 16 before. I don't know how many months, but it wasn't 17 like, you know, the week before or anything like 18 that. 19 Q Okay. Who were you talking to about that? 20 A I talked to pretty much all of my managers, 21 and all the folks that were in our group that I was 22 talking about, like Jerry Harville, Kulakowski, 23 Larry Eden, Terry Stafford, J.R., Michael White. 24 Q Anyone else? 25 A I can't tell you if there was anybody else</p>	<p style="text-align: right;">Page 57</p> <p>1 physical contact with one person on one occasion; is 2 that correct? 3 A That's the only one I remember. 4 Q And you don't recall any employee ever 5 telling you to stop doing that? 6 A No, no. 7 Q Do you think allowing horseplay like that in 8 the work environment is consistent with WestRock's 9 policies? 10 A I still don't consider what we were doing to 11 be horseplay, as I understand horseplay. 12 Q Were you aware that WestRock had a policy 13 prohibiting assault in the workplace? 14 A Yes. 15 Q And you didn't consider that behavior 16 assault? 17 A No. 18 Q Do you recall an incident in the shipping 19 office where Michael Kulakowski was bent over 20 looking at the computer and you came in and reached 21 your hand between his legs and grabbed his balls? 22 A I do not, no. 23 Q Is it that you just don't remember it or it 24 did not happen? 25 A It didn't happen.</p>

<p style="text-align: right;">Page 58</p> <p>1 Q Did you ever act like you were going to run 2 down Michael Kulakowski in your truck or hit him in 3 your truck? 4 A No. 5 Q Do you recall an incident outside of the 6 shipping office at the picnic table where you came 7 up and hit Michael Kulakowski in his groin area? 8 A I don't, no. 9 Q You don't recall it or it did not happen? 10 A It did not happen. 11 Q Do you recall an incident in the shipping 12 office where you grabbed Michael Kulakowski and 13 threw him across the office desk? 14 A No. 15 Q Did you ever show your genitals or your 16 penis to any employees at WestRock? 17 A No. 18 MS. COLLINS: Okay. If I could just 19 have a break to review my notes. 20 MR. JOHNSTON: Sure. 21 VIDEOGRAPHER: We are going off the 22 record. The time on the monitor is 10:36 a.m. 23 (Recess observed.) 24 VIDEOGRAPHER: We are back on the 25 record. The time on the monitor is 10:44 a.m.</p>	<p style="text-align: right;">Page 60</p> <p>1 Q And you didn't document anywhere that you 2 had that discussion? 3 A No. 4 Q And by regular -- you said that was a 5 regular sort of thing. Would that be like weekly or 6 daily? 7 A That's really hard for me to say. It was 8 just not uncommon. And folks just didn't think a 9 whole lot about it. 10 MS. COLLINS: Okay. That's all I have. 11 E X A M I N A T I O N 12 BY MS. DOHNER SMITH: 13 Q Mr. Whited, Helen Kendall's actual job title 14 was administrative assistant, correct? 15 A Correct. 16 Q And she didn't have any reporting structure 17 up through the HR group, she only reported to 18 management at the Gallatin facility, correct? 19 MS. COLLINS: Objection to form. 20 THE WITNESS: No. 21 BY MS. DOHNER SMITH: 22 Q She didn't have any reporting structure with 23 respect to Joy Jones, did she? 24 A Not directly to Joy, no. 25 Q Well, Terri Henley wasn't in any way her</p>
<p style="text-align: right;">Page 59</p> <p>1 BY MS. COLLINS: 2 Q Mr. Whited, earlier you described what you 3 called camaraderie between you and several other 4 male employees. How often would y'all engage in 5 that sort of behavior, where you pretended to hit 6 someone in the groin area, or what you said -- 7 characterized as pretending to hit someone, how 8 often would y'all do that? Was that a regular -- 9 A That was regular, yeah. 10 Q And that was a regular sort of thing up 11 until your termination? 12 A Up until we had the discussions that I've -- 13 I mentioned earlier that -- for fear that somebody 14 might misinterpret because of that incident out of 15 Murfreesboro. 16 Q And you don't remember when that discussion 17 was? 18 A I'm sorry, I don't. 19 Q Okay. Was it in 2016? 20 A Yes. 21 Q Sometime? 22 A It was, it was. 23 Q You don't remember what time of year in 24 2016? 25 A No, I'm sorry, I don't.</p>	<p style="text-align: right;">Page 61</p> <p>1 boss, correct? 2 MS. COLLINS: Objection to form. 3 THE WITNESS: Really didn't have her as 4 a boss, I don't think. She worked directly with 5 Terri. 6 BY MS. DOHNER SMITH: 7 Q She would pass information on to Terri? 8 A Okay. 9 Q Correct? 10 A Yes, that's true. 11 Q Okay. There wasn't actually a local HR 12 representative, and so Helen was the one who would 13 pass questions on, pass information on, get forms 14 from HR to give to employees, correct? 15 A Right. 16 MS. COLLINS: Objection to form. 17 BY MS. DOHNER SMITH: 18 Q So she wasn't really technically an HR 19 person, she was the person there kind of being the 20 go-between, between the plant and HR? 21 A Yes. Helen had a number of 22 responsibilities. That was -- that communication 23 piece was part of it. 24 Q Okay. Now, the surveys that took place at 25 the Gallatin facility, those were actually biannual,</p>

<p style="text-align: right;">Page 62</p> <p>1 correct? They weren't every year?</p> <p>2 A Employee surveys?</p> <p>3 Q Uh-huh.</p> <p>4 A I think they missed the prior year. I</p> <p>5 really can't recall.</p> <p>6 Q Okay. So if other people in the corporate</p> <p>7 structure testified that they're done biannually,</p> <p>8 you would have no reason to --</p> <p>9 (Overlapping speech.)</p> <p>10 A I have no reason to say that's wrong.</p> <p>11 MS. COLLINS: Objection to form.</p> <p>12 BY MS. DOHNER SMITH:</p> <p>13 Q In 2015, the company changed from RockTenn</p> <p>14 to WestRock, correct?</p> <p>15 A True.</p> <p>16 Q And when that took place, corporate sent out</p> <p>17 HR to do code of conduct training at the facility,</p> <p>18 correct?</p> <p>19 A For --</p> <p>20 Q For employees.</p> <p>21 A You know, I don't remember that.</p> <p>22 Q Okay. Could have happened, you just don't</p> <p>23 remember it?</p> <p>24 A Could be, could be.</p> <p>25 Q All right. Earlier you were talking about</p>	<p style="text-align: right;">Page 64</p> <p>1 worked together for a number of years, and that's --</p> <p>2 it was -- well, that's all it was, camaraderie in a</p> <p>3 group of friends.</p> <p>4 Q So you didn't mean it to be harmful in any</p> <p>5 way?</p> <p>6 A Oh, absolutely not.</p> <p>7 Q And you didn't mean to hurt anybody</p> <p>8 physically --</p> <p>9 A No.</p> <p>10 Q -- in any way?</p> <p>11 MS. COLLINS: Objection to form.</p> <p>12 BY MS. DOHNER SMITH:</p> <p>13 Q Was that meant to be sexual in nature at</p> <p>14 all?</p> <p>15 A No.</p> <p>16 MS. COLLINS: Objection to form.</p> <p>17 BY MS. DOHNER SMITH:</p> <p>18 Q As of August 30th, 2016, you didn't have</p> <p>19 any intent to resign at that time, did you, as of --</p> <p>20 A No.</p> <p>21 Q -- August 30th?</p> <p>22 The only reason you would have considered a</p> <p>23 voluntary resignation is because you were told you</p> <p>24 were being terminated?</p> <p>25 A Yes.</p>
<p style="text-align: right;">Page 63</p> <p>1 this group, I think you called it, a group of</p> <p>2 friends.</p> <p>3 A Uh-huh.</p> <p>4 Q Was Mr. Kulakowski your friend?</p> <p>5 A Oh, yes.</p> <p>6 Q Okay. And you talked about the conduct you</p> <p>7 said was camaraderie, where you would pretend or</p> <p>8 make a movement like you were going to hit somebody</p> <p>9 but not actually make contact?</p> <p>10 A Right.</p> <p>11 Q Would Mr. Kulakowski engage in that as well?</p> <p>12 A Yes.</p> <p>13 Q Would he -- who would he engage in that type</p> <p>14 of behavior with?</p> <p>15 A Oh, shucks. Pretty much anybody in the</p> <p>16 group. Terry Stafford, J.R., myself, Donnie Taylor.</p> <p>17 And I'm sorry, I just can't remember all of them off</p> <p>18 the top of my head, but it was -- it was a number of</p> <p>19 folks, yeah.</p> <p>20 Q And was that something that was contained</p> <p>21 just within your group of friends?</p> <p>22 A It was -- we didn't -- you didn't do that</p> <p>23 kind of thing with a newcomer. You know, that --</p> <p>24 that could -- maybe they would not understand what</p> <p>25 was going on. But there were some of us who had</p>	<p style="text-align: right;">Page 65</p> <p>1 Q Are you at all related to Helen Kendall in</p> <p>2 any way?</p> <p>3 A I'm sorry?</p> <p>4 Q I'm sorry. Are you at all related to Helen</p> <p>5 Kendall in any way?</p> <p>6 A No.</p> <p>7 Q By marriage or anything like that?</p> <p>8 A My first wife's sister was married to</p> <p>9 Helen's brother.</p> <p>10 Q Okay. But you're not related in any --</p> <p>11 A No.</p> <p>12 Q -- way?</p> <p>13 A No.</p> <p>14 Q Okay.</p> <p>15 A That was the closest I got to a</p> <p>16 relationship.</p> <p>17 Q I think earlier you were asked if you recall</p> <p>18 calling Mr. Kulakowski a stupid son of a bitch, and</p> <p>19 you said no. Do you just not recall that or did</p> <p>20 that not happen?</p> <p>21 A That didn't happen.</p> <p>22 Q Did Mr. Kulakowski use curse words in the</p> <p>23 workforce?</p> <p>24 A Oh, yeah. Yes.</p> <p>25 Q What type of curse words would he use in the</p>

<p style="text-align: right;">Page 66</p> <p>1 workforce?</p> <p>2 A You know, he would -- Mr. Kulakowski would</p> <p>3 use -- you know, he'd drop the F word, you know. I</p> <p>4 really can't pin them down. I just -- the same type</p> <p>5 of thing a bunch of redneck guys do.</p> <p>6 Q Okay. You were asked some questions about</p> <p>7 whether you would pretend like you were going to hit</p> <p>8 Mr. Kulakowski with your truck or if you actually</p> <p>9 hit him. I think that was a do you recall question.</p> <p>10 Did you ever act like you were going to hit</p> <p>11 him with your truck or hit him with your truck?</p> <p>12 A No, I've never hit him with the truck, I'm</p> <p>13 sure. And no, I never -- I never made any attempt</p> <p>14 to run over Mr. Kulakowski, no. I think that's what</p> <p>15 you asked.</p> <p>16 Q Yes. You were asked about an incident in</p> <p>17 the shipping office and whether you recalled</p> <p>18 throwing Mr. Kulakowski across a desk. Is that</p> <p>19 something you just don't recall or that didn't</p> <p>20 happen?</p> <p>21 A No, I didn't -- I didn't do that.</p> <p>22 Q Okay. Part of your job responsibilities as</p> <p>23 the general manager would be to ensure that</p> <p>24 WestRock's policies were complied with, correct?</p> <p>25 A Right.</p>	<p style="text-align: right;">Page 68</p> <p>1 anybody to slap Mr. Kulakowski in the groin,</p> <p>2 correct?</p> <p>3 A Correct.</p> <p>4 Q Got to run through these with each of these.</p> <p>5 I'm sorry; just bear with me.</p> <p>6 Same thing with kicking Mr. Kulakowski in</p> <p>7 the groin. That's not something that was part of</p> <p>8 your job duties, correct?</p> <p>9 A Correct.</p> <p>10 Q It wasn't something you were employed to do,</p> <p>11 correct?</p> <p>12 A Correct.</p> <p>13 Q That's not something that, if it happened,</p> <p>14 was serving in any positive way to WestRock,</p> <p>15 correct?</p> <p>16 MS. COLLINS: Objection to form.</p> <p>17 BY MS. DOHNER SMITH:</p> <p>18 Q It wasn't in service?</p> <p>19 A Right.</p> <p>20 Q That's not something that WestRock would</p> <p>21 expect a general manager to do?</p> <p>22 MS. COLLINS: Objection to form.</p> <p>23 THE WITNESS: To?</p> <p>24 BY MS. DOHNER SMITH:</p> <p>25 Q To kick Mr. Kulakowski in the groin?</p>
<p style="text-align: right;">Page 67</p> <p>1 Q That includes the code of conduct?</p> <p>2 A Yes.</p> <p>3 Q That includes the anti-violence policy?</p> <p>4 A Yes.</p> <p>5 Q And that would include the anti-harassment</p> <p>6 policy?</p> <p>7 A Yes.</p> <p>8 Q Hitting Mr. Kulakowski in his groin would</p> <p>9 not be part of your job duties, would it?</p> <p>10 A No.</p> <p>11 Q That's not something you were employed by</p> <p>12 the company to do, correct?</p> <p>13 A Correct.</p> <p>14 Q And I'm not saying you did it, but that</p> <p>15 would not be anything that was serving to WestRock</p> <p>16 in any way, correct?</p> <p>17 A Correct.</p> <p>18 Q And that's not something that WestRock would</p> <p>19 expect from you as a general manager, correct?</p> <p>20 MS. COLLINS: Objection to form.</p> <p>21 THE WITNESS: As far as hitting?</p> <p>22 BY MS. DOHNER SMITH:</p> <p>23 Q Actually hitting him in the groin.</p> <p>24 A Right.</p> <p>25 Q Okay. And you were never authorized by</p>	<p style="text-align: right;">Page 69</p> <p>1 A To actually hit?</p> <p>2 Q To kick him in the groin, to make contact</p> <p>3 and kick him in the groin?</p> <p>4 A Right.</p> <p>5 Q And that's not something that WestRock</p> <p>6 authorized you to do, kick him in the groin?</p> <p>7 A Right.</p> <p>8 Q We're going to run through the same thing</p> <p>9 with grabbing of the groin. That's not something</p> <p>10 that's part of your job duties, correct?</p> <p>11 A Right.</p> <p>12 Q It's not something you were employed to do?</p> <p>13 A Correct.</p> <p>14 Q Doing that would not be in service to</p> <p>15 WestRock in any way?</p> <p>16 MS. COLLINS: Objection to form.</p> <p>17 THE WITNESS: Correct.</p> <p>18 BY MS. DOHNER SMITH:</p> <p>19 Q It's not something that WestRock would have</p> <p>20 expected you to do?</p> <p>21 MS. COLLINS: Objection to form.</p> <p>22 THE WITNESS: Correct.</p> <p>23 BY MS. DOHNER SMITH:</p> <p>24 Q And that's not something that WestRock would</p> <p>25 have authorized you to do?</p>

<p style="text-align: right;">Page 70</p> <p>1 A Correct.</p> <p>2 MS. COLLINS: Objection to form.</p> <p>3 BY MS. DOHNER SMITH:</p> <p>4 Q Let's run through the same thing with</p> <p>5 hitting Mr. Kulakowski with a broom. That's not</p> <p>6 something that would be part of your job duties?</p> <p>7 A Correct.</p> <p>8 Q Not something you were employed to do?</p> <p>9 A Correct.</p> <p>10 Q Not something that would be in service of</p> <p>11 WestRock?</p> <p>12 MS. COLLINS: Objection to form.</p> <p>13 THE WITNESS: Correct.</p> <p>14 BY MS. DOHNER SMITH:</p> <p>15 Q Not something WestRock would have expected</p> <p>16 you to do?</p> <p>17 MS. COLLINS: Objection to form.</p> <p>18 THE WITNESS: I'm sorry. I'm losing</p> <p>19 you now.</p> <p>20 BY MS. DOHNER SMITH:</p> <p>21 Q Sorry. I think I'm getting a little softer.</p> <p>22 Sorry about that.</p> <p>23 Hitting Mr. Kulakowski with a broom, that's</p> <p>24 not something WestRock would have expected you to</p> <p>25 do?</p>	<p style="text-align: right;">Page 72</p> <p>1 BY MS. DOHNER SMITH:</p> <p>2 Q And that is not something that authorized --</p> <p>3 or WestRock would have authorized you to do?</p> <p>4 A No.</p> <p>5 Q And by no with those, you mean correct, that</p> <p>6 was a correct statement?</p> <p>7 A Correct. I'm sorry.</p> <p>8 Q All right. Let's talk about the allegation</p> <p>9 that you hit him with your truck or pretended to hit</p> <p>10 him with your truck. That's not something that</p> <p>11 would be part of your job duties?</p> <p>12 A No.</p> <p>13 Q And that is not something you were employed</p> <p>14 to do?</p> <p>15 A Correct.</p> <p>16 Q Your earlier no, that means correct?</p> <p>17 A Right.</p> <p>18 Q Thank you. That wouldn't be serving</p> <p>19 WestRock in any way, correct?</p> <p>20 A Correct.</p> <p>21 MS. COLLINS: Objection to form.</p> <p>22 BY MS. DOHNER SMITH:</p> <p>23 Q And that was not something WestRock would</p> <p>24 expect you to do, correct?</p> <p>25 A Correct.</p>
<p style="text-align: right;">Page 71</p> <p>1 MS. COLLINS: Objection to form.</p> <p>2 THE WITNESS: No.</p> <p>3 BY MS. DOHNER SMITH:</p> <p>4 Q And that's not something WestRock authorized</p> <p>5 you to do?</p> <p>6 A No.</p> <p>7 Q Same thing with -- there's been an</p> <p>8 allegation that you unzipped your pants, exposed</p> <p>9 your penis and told Mr. Kulakowski to suck your</p> <p>10 dick.</p> <p>11 That's not something that would be part of</p> <p>12 your job duties, correct?</p> <p>13 A No.</p> <p>14 Q That's not something you were employed to</p> <p>15 do?</p> <p>16 A No.</p> <p>17 Q That's not something that would be in</p> <p>18 service to WestRock in any way?</p> <p>19 MS. COLLINS: Objection to form.</p> <p>20 THE WITNESS: No.</p> <p>21 BY MS. DOHNER SMITH:</p> <p>22 Q That is not something that WestRock</p> <p>23 expected?</p> <p>24 MS. COLLINS: Objection to form.</p> <p>25 THE WITNESS: No.</p>	<p style="text-align: right;">Page 73</p> <p>1 MS. COLLINS: Objection to form.</p> <p>2 BY MS. DOHNER SMITH:</p> <p>3 Q And that's not something that you were</p> <p>4 authorized by WestRock to do, correct?</p> <p>5 A Correct.</p> <p>6 Q What about calling an employee a pussy, is</p> <p>7 that something that would be part of your job</p> <p>8 duties?</p> <p>9 A No.</p> <p>10 Q You weren't employed to call people that</p> <p>11 term, were you?</p> <p>12 A No.</p> <p>13 Q And if you had called somebody a pussy, that</p> <p>14 wouldn't be serving WestRock in any way, correct?</p> <p>15 A No.</p> <p>16 MS. COLLINS: Objection to form.</p> <p>17 BY MS. DOHNER SMITH:</p> <p>18 Q WestRock wouldn't expect you as a general</p> <p>19 manager to be calling employees pussies, correct?</p> <p>20 A No.</p> <p>21 MS. COLLINS: Objection to form.</p> <p>22 THE WITNESS: Correct.</p> <p>23 BY MS. DOHNER SMITH:</p> <p>24 Q And that's not something that WestRock would</p> <p>25 authorize and say, hey, call --</p>

<p style="text-align: right;">Page 74</p> <p>1 MS. COLLINS: Objection to the form.</p> <p>2 BY MS. DOHNER SMITH:</p> <p>3 Q -- your employees pussies, correct?</p> <p>4 A Correct.</p> <p>5 Q Same thing with calling Mr. Kulakowski a</p> <p>6 quote/unquote fucking Polak. That wouldn't be part</p> <p>7 of your job duties, correct?</p> <p>8 A Correct.</p> <p>9 Q You weren't employed to do that, correct?</p> <p>10 A Correct.</p> <p>11 Q And that wouldn't be serving WestRock in any</p> <p>12 way, correct?</p> <p>13 MS. COLLINS: Objection to the form.</p> <p>14 THE WITNESS: Correct.</p> <p>15 BY MS. DOHNER SMITH:</p> <p>16 Q And that is not something WestRock would</p> <p>17 have expected you to do, correct?</p> <p>18 MS. COLLINS: Objection.</p> <p>19 THE WITNESS: Correct.</p> <p>20 BY MS. DOHNER SMITH:</p> <p>21 Q And that's not something that you were</p> <p>22 authorized to do, correct?</p> <p>23 A Correct.</p> <p>24 Q There's also been an allegation by</p> <p>25 Mr. Kulakowski that you made a comment to him that</p>	<p style="text-align: right;">Page 76</p> <p>1 Q Hitting Mr. Kulakowski with a broom would be</p> <p>2 a violation of company policy, correct?</p> <p>3 A Correct.</p> <p>4 Q Hitting him with your car would be -- or</p> <p>5 your truck --</p> <p>6 A Correct.</p> <p>7 Q My husband doesn't want his truck called a</p> <p>8 car, so...</p> <p>9 A Right.</p> <p>10 Q So hitting him with your truck would not</p> <p>11 be -- or would be a violation of company policy?</p> <p>12 A Correct.</p> <p>13 Q Calling Mr. Kulakowski a pussy, a stupid</p> <p>14 fucking Polak, or saying I'm going to fuck your</p> <p>15 wife, those would be a violation of company policy,</p> <p>16 correct?</p> <p>17 A Yeah. And if I'm squirming, it's because</p> <p>18 I'm just not used to hearing this language in mixed</p> <p>19 company.</p> <p>20 Q I'm sorry. I grew up with four brothers, so</p> <p>21 I've heard it all by now.</p> <p>22 A Okay. Well, yeah. No, they don't expect me</p> <p>23 to do that.</p> <p>24 Q And those would all be a violation of</p> <p>25 company policy?</p>
<p style="text-align: right;">Page 75</p> <p>1 he needed to stay late so you could go home and fuck</p> <p>2 his wife. Is that anything that you ever said to</p> <p>3 him?</p> <p>4 A No.</p> <p>5 Q Would that be part of your job duties?</p> <p>6 A No.</p> <p>7 Q Would that be something you were employed to</p> <p>8 do?</p> <p>9 A No.</p> <p>10 Q Would that be something that was serving</p> <p>11 WestRock in any way?</p> <p>12 A No.</p> <p>13 Q Is that something WestRock would have</p> <p>14 expected you to say to an employee?</p> <p>15 A No.</p> <p>16 MS. COLLINS: Objection to form.</p> <p>17 BY MS. DOHNER SMITH:</p> <p>18 Q Is that something that WestRock authorized</p> <p>19 you to say to an employee?</p> <p>20 A No.</p> <p>21 Q Now, actually, making contact, hitting,</p> <p>22 kicking, grabbing Mr. Kulakowski in the groin, that</p> <p>23 would be a violation of WestRock's policies,</p> <p>24 correct?</p> <p>25 A Correct.</p>	<p style="text-align: right;">Page 77</p> <p>1 A Yes.</p> <p>2 Q Okay. Employees receive a copy of the -- of</p> <p>3 the employee handbook, correct?</p> <p>4 A Yes.</p> <p>5 Q And that has a copy of the compliance</p> <p>6 hotline in it; is that correct?</p> <p>7 A Yes.</p> <p>8 Q Now, the compliance hotline, that's also</p> <p>9 posted at the --</p> <p>10 A Yes.</p> <p>11 Q -- facility, correct?</p> <p>12 A It is.</p> <p>13 Q And that's been posted for years, correct?</p> <p>14 A Yes.</p> <p>15 Q That's not something that just went up in</p> <p>16 2016.</p> <p>17 A No.</p> <p>18 Q That's been there for a long time?</p> <p>19 A Yes.</p> <p>20 Q How far back can you recall the compliance</p> <p>21 hotline being posted?</p> <p>22 A Ever since we had one.</p> <p>23 Q Do you know when that was?</p> <p>24 A I do -- it's been a long, long time.</p> <p>25 Q Okay.</p>

<p style="text-align: right;">Page 78</p> <p>1 A Years and years.</p> <p>2 Q And that's posted on the employee bulletin</p> <p>3 board in the breakroom?</p> <p>4 MS. COLLINS: Objection to form.</p> <p>5 THE WITNESS: Well, the bulletin boards</p> <p>6 are not in the breakroom.</p> <p>7 BY MS. DOHNER SMITH:</p> <p>8 Q Oh, okay. Where are they?</p> <p>9 A They're in the walkway --</p> <p>10 Q Okay.</p> <p>11 A -- to the breakroom.</p> <p>12 Q Okay. And that's where that's posted?</p> <p>13 A Yes.</p> <p>14 Q All right.</p> <p>15 A Or that's where they were. I don't know if</p> <p>16 they've been moved or not.</p> <p>17 Q Okay.</p> <p>18 A When I was there, they were in the -- they</p> <p>19 were in the -- posted in the walkway.</p> <p>20 Q Okay. Thank you.</p> <p>21 Throwing somebody across a desk, that's not</p> <p>22 something that would be part of your job duties,</p> <p>23 correct?</p> <p>24 A Correct.</p> <p>25 Q And that's not something you were employed</p>	<p style="text-align: right;">Page 80</p> <p>1 A No, it would not.</p> <p>2 Q And that would be a violation of policy?</p> <p>3 A Yes, it would.</p> <p>4 Q So you draw a distinction between the kind</p> <p>5 of act of pretending you're going to hit somebody</p> <p>6 and then actually hitting somebody?</p> <p>7 A Yes.</p> <p>8 Q Okay. Earlier you asked if you recalled</p> <p>9 whether you told employees that hotline complaints</p> <p>10 came to you. Is that something you just don't</p> <p>11 recall telling them or is that something you didn't</p> <p>12 tell them?</p> <p>13 A I'm sorry. Say that -- I'm not sure I</p> <p>14 understood what you just asked me.</p> <p>15 Q Sorry. And I talk fast. I'm from the</p> <p>16 north.</p> <p>17 A No, that's okay. I'm just not sure I</p> <p>18 understood what you said.</p> <p>19 Q Earlier you were asked a question about</p> <p>20 whether you recall if you told employees that</p> <p>21 hotline complaints came to you.</p> <p>22 A Okay.</p> <p>23 Q And you said no. So do you just not recall</p> <p>24 that or is that something you didn't tell employees?</p> <p>25 A I -- I did not tell employees that hotline</p>
<p style="text-align: right;">Page 79</p> <p>1 to do?</p> <p>2 A Correct.</p> <p>3 Q And that's not something that would be</p> <p>4 serving to WestRock in any way?</p> <p>5 A Correct.</p> <p>6 MS. COLLINS: Objection to form.</p> <p>7 BY MS. DOHNER SMITH:</p> <p>8 Q That's not something WestRock expected you</p> <p>9 to do?</p> <p>10 MS. COLLINS: Objection to form.</p> <p>11 THE WITNESS: Correct.</p> <p>12 BY MS. DOHNER SMITH:</p> <p>13 Q And that's not something WestRock authorized</p> <p>14 you to do?</p> <p>15 A Correct.</p> <p>16 Q I think you testified that this group of</p> <p>17 friends that would pretend to hit each other, it</p> <p>18 wasn't expected that anybody was actually going to</p> <p>19 hit each other, was it?</p> <p>20 MS. COLLINS: Objection to form.</p> <p>21 THE WITNESS: No, no.</p> <p>22 BY MS. DOHNER SMITH:</p> <p>23 Q And if they were actually hitting each other</p> <p>24 in the groin, that would not be appropriate</p> <p>25 workplace behavior?</p>	<p style="text-align: right;">Page 81</p> <p>1 complaints came to me.</p> <p>2 Q Okay. Because they don't come to you,</p> <p>3 right?</p> <p>4 A They don't -- no, I don't get them. Now, as</p> <p>5 I did say earlier, I may be asked about them by</p> <p>6 somebody like Terri Henley.</p> <p>7 Q I think earlier you testified that with your</p> <p>8 group of friends you would pretend, you know, to hit</p> <p>9 them, but you wouldn't do that with female</p> <p>10 employees?</p> <p>11 A Right.</p> <p>12 Q Why wouldn't you do that with female</p> <p>13 employees?</p> <p>14 A I'm not sure that -- they're just not that</p> <p>15 close a friendly relationship with female employees</p> <p>16 to do that.</p> <p>17 Q Okay. And you didn't engage in that type of</p> <p>18 conduct, pretending to hit people, males that</p> <p>19 weren't your friends? That's a horrible question.</p> <p>20 A No, we didn't.</p> <p>21 Q Did you understand what I asked? For</p> <p>22 example, men that weren't your friends, you didn't</p> <p>23 pretend to slap them in the groin either?</p> <p>24 A The men that you didn't know, yeah,</p> <p>25 newcomers, those, no, didn't.</p>

<p style="text-align: right;">Page 82</p> <p>1 Q So it was just your male friends?</p> <p>2 A Yeah. It was the -- yeah, the group of</p> <p>3 guys. And that's what it amounted to, just a group</p> <p>4 of guys that worked together, and they were very</p> <p>5 comfortable working with each other.</p> <p>6 Q You've never threatened to terminate an</p> <p>7 employee if they reported you to the compliance</p> <p>8 hotline?</p> <p>9 A No.</p> <p>10 Q Did you ever tell Mr. Kulakowski to work off</p> <p>11 the clock?</p> <p>12 A No.</p> <p>13 Q Did you ever tell him that he couldn't punch</p> <p>14 in if he came back to work after he left during his</p> <p>15 normal shift?</p> <p>16 A If he was called back? No.</p> <p>17 Q You expected he would punch in if he was</p> <p>18 called back to work?</p> <p>19 A Yes.</p> <p>20 MS. DOHNER SMITH: That's it.</p> <p>21 MS. COLLINS: I have a couple of</p> <p>22 follow-up.</p> <p>23 E X A M I N A T I O N</p> <p>24 BY MS. COLLINS:</p> <p>25 Q You were asked on cross-examination about</p>	<p style="text-align: right;">Page 84</p> <p>1 Q Yes.</p> <p>2 A I don't remember ever telling Keith that I</p> <p>3 was going to resign, no. Now, I will say that I was</p> <p>4 63 years old. My intention would have been to</p> <p>5 retire after 65. And we were having discussions</p> <p>6 about my retirement, but we had no discussion</p> <p>7 about -- but I don't know about how much discussion</p> <p>8 I had with Keith about that. But no, I didn't have</p> <p>9 any discussion about resigning.</p> <p>10 Q A moment ago you said that you were</p> <p>11 uncomfortable with some of the language that was</p> <p>12 used in mixed company, right?</p> <p>13 A Here, yes.</p> <p>14 Q Would you also be uncomfortable with curse</p> <p>15 words or the type of language that was used in mixed</p> <p>16 company in the workplace?</p> <p>17 A Yes.</p> <p>18 Q So using that sort of language in the</p> <p>19 workplace was primarily around men or guys?</p> <p>20 MS. DOHNER SMITH: Objection.</p> <p>21 THE WITNESS: Yes.</p> <p>22 MS. COLLINS: That's all I have.</p> <p>23 MR. JOHNSTON: Mr. Whited --</p> <p>24 MS. DOHNER SMITH: I'm sorry.</p> <p>25 MR. JOHNSTON: Go ahead.</p>
<p style="text-align: right;">Page 83</p> <p>1 cursing in the workplace. Was that -- and you</p> <p>2 specifically said a bunch of redneck guys, something</p> <p>3 a bunch of redneck guys do --</p> <p>4 A Okay.</p> <p>5 Q -- right?</p> <p>6 Was cursing in the workplace something that</p> <p>7 happened on a regular basis?</p> <p>8 A Cursing happened, yes. Yes.</p> <p>9 Q You didn't write any employees up for</p> <p>10 cursing in the workplace, did you?</p> <p>11 A No.</p> <p>12 Q You didn't have Mike Eden write -- or Larry</p> <p>13 Eden write up employees for cursing in the</p> <p>14 workplace, did you?</p> <p>15 A No. Now, that's not to say that we didn't</p> <p>16 coach or counsel people.</p> <p>17 Q Would that have been documented?</p> <p>18 A No.</p> <p>19 Q Okay. Do you recall calling Keith Hall and</p> <p>20 telling him that you were going to resign at the</p> <p>21 beginning of 2017?</p> <p>22 A No.</p> <p>23 Q Do you dispute that you told him something</p> <p>24 like that?</p> <p>25 A That I was going to resign?</p>	<p style="text-align: right;">Page 85</p> <p>1 E X A M I N A T I O N</p> <p>2 BY MS. DOHNER SMITH:</p> <p>3 Q Did women at the -- working out on the floor</p> <p>4 tend to cuss as well or use cuss words?</p> <p>5 A Not in front of -- not in front of me. I</p> <p>6 would hear occasionally somebody would.</p> <p>7 Q Okay. All right. So it's not that cussing</p> <p>8 didn't go on in front of women; you just weren't</p> <p>9 there to hear it?</p> <p>10 A Right.</p> <p>11 Q Okay.</p> <p>12 A And if it was -- I will go on to say, if it</p> <p>13 was -- if this was loud, if this was broadcasted --</p> <p>14 you know, when I mentioned counseling folks about</p> <p>15 some of this, yeah, we -- we didn't want it -- if</p> <p>16 the two of you were sitting there having a</p> <p>17 conversation and you wanted to keep it between the</p> <p>18 two of you, I don't care what kind of language you</p> <p>19 used. You know, that would be between the two</p> <p>20 friends. But that young lady down there didn't need</p> <p>21 to hear that.</p> <p>22 Q Okay.</p> <p>23 A I hope that answered the question.</p> <p>24 MS. DOHNER SMITH: It does. That's it.</p> <p>25 MS. COLLINS: Your turn, if you have</p>

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1 anything.

2 MR. JOHNSTON: Just quickly.

3 E X A M I N A T I O N

4 BY MR. JOHNSTON:

5 Q Mr. Whited, how long have you known

6 Mr. Kulakowski?

7 A Actually, I think he worked for the plant

8 ten, eleven years.

9 Q Okay. And that -- and your knowledge of

10 Mr. Kulakowski is through his employment at the

11 plant, correct?

12 A I met him just shortly before I hired him.

13 And then in way of explanation, he was working at

14 the facility that we leased, and I hired him from

15 that because of his forklift experience.

16 Q All right. And over the course of that ten

17 or eleven years, did you work with him more or less

18 on a regular basis?

19 A Yes.

20 Q Interact with him frequently, two, three,

21 four times a week?

22 A Oh, absolutely, yes.

23 Q Over that period of time, did you develop an

24 opinion as to Mr. Kulakowski's truthfulness?

25 A Yes.

Page 87

1 Q And what's that opinion?

2 MS. COLLINS: Objection to form.

3 THE WITNESS: Not truthful.

4 MR. JOHNSTON: Thank you. That's all I

5 have.

6 MS. COLLINS: That's all I have.

7 MS. DOHNER SMITH: That's it.

8 VIDEOGRAPHER: This marks the end of

9 Disk 1 and it concludes the video deposition of

10 William Tommy Whited. We are off the record. The

11 time on the monitor is 11:15 a.m.

12 FURTHER DEPONENT SAITH NOT.

13 (Proceedings concluded at 11:15 a.m.)

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1 REPORTER'S CERTIFICATE

2

3 I, Jerri L. Porter, RPR, CRR, Notary

4 Public and Court Reporter, do hereby certify that I

5 recorded to the best of my skill and ability by

6 machine shorthand all the proceedings in the

7 foregoing transcript, and that said transcript is a

8 true, accurate, and complete transcript to the best

9 of my ability.

10 I further certify that I am not an

11 attorney or counsel of any of the parties, nor a

12 relative or employee of any attorney or counsel

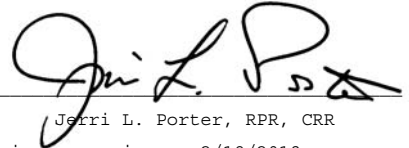
13 connected with the action, nor financially

14 interested in the action.

15 SIGNED this 2nd day of January, 2018.

16

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18 

19

20 Jerri L. Porter, RPR, CRR

21 My Notary commission expires: 2/19/2018

22 Tennessee LCR No. 335

23 Expires: 6/30/2018

24

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1 E R R A T A

2

3 I, WILLIAM TOMMY WHITED, having read the

4 foregoing deposition, Pages 1 through 87, taken

5 December 21, 2017, do hereby certify said

6 testimony is a true and accurate transcript,

7 with the following changes, if any:

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